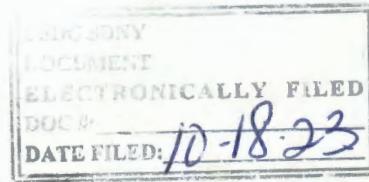


UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK



In re

CUSTOMS AND TAX ADMINISTRATION OF
THE KINGDOM OF DENMARK
(SKATTEFORVALTNINGEN) TAX REFUND
SCHEME LITIGATION

This document relates to: 18-cv-04896.

MASTER DOCKET

18-md-2865 (LAK)

STIPULATION AND [PROPOSED] ORDER OF VOLUNTARY DISMISSAL

Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), Plaintiff Skatteforvaltningen (“SKAT”) and Defendants The TKKJ LLC 401K Plan (“TKKJ Plan”) and Thomas Kertelits (“Kertelits”) hereby stipulate and agree that SKAT’s action against Defendants TKKJ Plan and Kertelits, captioned *Skatteforvaltningen v. The TKKJ LLC 401K Plan, et al.*, No. 18-cv-04896, which is part of these consolidated proceedings, is hereby voluntarily dismissed by SKAT, without prejudice, with each party bearing its own costs and attorneys’ fees.

Dated: New York, New York
October 10, 2023

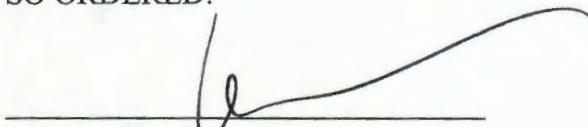
By: /s/ Marc Weinstein
Marc A. Weinstein
HUGHES HUBBARD & REED LLP
One Battery Park Plaza
New York, New York 10004-1482
Telephone: (212) 837-6000
Fax: (212) 422-4726
marc.weinstein@hugheshubbard.com

*Counsel for Plaintiff Skatteforvaltningen
(Customs and Tax Administration of the
Kingdom of Denmark)*

By: /s/ Joseph LoPiccolo
Joseph LoPiccolo
POULOS LOPICCOLO PC
311 West 43rd St., 11th Fl., Ste. 124
New York, NY 10036
Telephone: (646) 931-0011
Fax: (732) 358-0180
lopiccolo@pllawfirm.com

*Counsel for The TKKJ LLC 401K Plan and
Thomas Kertelits*

SO ORDERED:


Lewis A. Kaplan
United States District Judge

10/18/23